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IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

|                                       |        |                         |
|---------------------------------------|--------|-------------------------|
|                                       | -----X |                         |
|                                       | :      |                         |
| In re:                                | :      | Chapter 11              |
|                                       | :      |                         |
| GENERAL MOTORS CORP., <i>et al.</i> , | :      | Case No. 09-50026 (REG) |
|                                       | :      |                         |
| Debtors.                              | :      | (Jointly Administered)  |
|                                       | -----X |                         |

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**JOINT STATEMENT REGARDING TREATMENT OF  
SUCCESSOR LIABILITY ISSUES FROM THE AD HOC  
COMMITTEE OF VICTIMS OF GENERAL MOTORS  
AND OTHER PRODUCT LIABILITY CLAIMANT ADVOCATES**

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It is our understanding that the sale documents currently provide for the following with regard to successor liability claims:

- **Treatment of “Future Claimants”:** (Product Liability)
  - Group consists of claimants whose “Triggering Liability Event” (*i.e.*, date of accident or event giving rise to personal injury or damage to property) occurs post-closing regardless of when vehicle was purchased.
  - These Claims will be assumed and paid by New GM.
- **Treatment of “Post-Petition Claimants”:** (Product Liability)
  - Group consists of claimants whose Triggering Liability Event occurs between the Petition Date (inclusive) and extending up through, but not including, the Closing Date.
  - These Claims will be afforded administrative claim priority and be paid by the estate.
- **Treatment of “Pre-Petition Existing Claimants”:** (Product Liability)
  - Group consists of claimants whose Triggering Liability Event occurred prepetition.
  - These claims are not being assumed by New GM and will be treated as general unsecured claims in the Debtors’ bankruptcy cases.
- **Asbestos Current and Future Claims and Environmental Claims”:**
  - Debtors position of current status is accurately set forth in their Statement.